

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RONNY L. JACKSON, *et al.*

Plaintiffs

V.

JOSEPH R. BIDEN, JR *et al.*

Defendants.

No. 2:22-cv-241

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants respectfully request a one-week extension of time to file a reply brief in support of their motion to dismiss, ECF No. 20, up to and including June 27, 2023. Counsel for Defendants conferred with counsel for Plaintiffs regarding this request pursuant to Local Civil Rule 7.1(a), and counsel for Plaintiffs indicate they do not oppose. In support of this request, Defendants state as follows:

1. Defendants filed their motion to dismiss Plaintiffs’ complaint on April 10, 2023. On May 4, Plaintiffs moved to extend their deadline to respond to the motion and Defendants’ deadline to reply. The Court granted the motion on May 9, thereby extending Defendants’ deadline to file a reply brief up to and including June 20, 2023.

2. Good cause exists for the requested one-week extension. Plaintiffs' opposition to Defendants' motion raises several bases for denial of the motion, and despite undersigned counsel's best efforts to file a reply brief by the Court's deadline, counsel requires additional time to prepare and seek supervisory review of the reply by the Defendant agencies and within the Department of Justice.

3. This is the first request for extension made by Defendants regarding their deadline to file a reply brief. There are currently no other deadlines scheduled in this matter, so the requested extension will not impact any existing deadlines.

4. Plaintiffs' counsel does not oppose the requested extension.

5. Defendants thus request a short, one-week extension of their time to file a reply brief in support of their motion to dismiss up to and including June 27, 2023. Defendants thank the Court for its consideration of this request.

Dated: June 12, 2023

Respectfully submitted,

BRIAN M. BOYNTON
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ANTHONY J. COPPOLINO
Deputy Director

/s/ Samuel Rebo
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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2023, I electronically filed this brief with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Samuel Rebo
SAMUEL REBO
U.S. Department of Justice